

**CITIZENS' COMMISSION ON
JAIL VIOLENCE**

**NINTH REPORT
OF THE IMPLEMENTATION MONITOR**

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SEPTEMBER 10, 2013

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OF THE IMPLEMENTATION MONITOR
September 10, 2013**

I am pleased to submit to the Board of Supervisors my Ninth Report regarding the implementation of the recommendations set forth in the September 28, 2012 Report of the Citizens' Commission on Jail Violence (the "Commission").

BACKGROUND

Since submitting my Eighth Report to the Board of Supervisors on August 13, 2013, I have continued to monitor the efforts by the Los Angeles Sheriff's Department (the "Department") to implement the Commission's recommendations. During this most recent period, the Department completed the implementation of two of the Commission's recommendations. With respect to holding management accountable, the Department completed the last of its internal Administrative investigations of matters arising out of the Commission's investigation and report, and all of the high level managers who had direct or indirect oversight of the Department's jail operations have now left the Department. The Department also implemented a new management protocol effective September 1, 2013, that requires Captains to consult and articulate a factual and legal basis prior to modifying the charges and/or discipline for dishonesty, excessive force, or failure to report force.

As reflected in the summary chart set forth below, as of the date of this Report, the Department has implemented 39 of the Commission's 60 recommendations¹ directed

¹ A more detailed breakdown of the status of the Department's implementation of each recommendation is attached as Appendix 1 to this Report. A comparison reflecting the progress of the Department's implementation of the recommendations is set forth in Appendix 2.

to the Department. It has partially implemented another 10 recommendations and is in the process of implementing another 11 recommendations.

Category	Implemented²	Partially Implemented³	In progress⁴	Total	Funding Request⁵
Use of Force	8	1	3	12	2
Management	12	0	2	14	2
Culture	5	3	0	8	3
Personnel/ Training	5	4	1	10	3
Discipline	8	2	5	15	5
Oversight	1	0	0	1	0
Total	39	10	11	60	15

The Department has requested funding to implement fully 15 of the remaining 21 recommendations.⁶ At this point, the Department has submitted funding requests for 33 positions for a Custody Training and Standards Bureau, which would implement Commission recommendations 5.2, 5.3, 5.8 and 6.3, and six Compliance Lieutenants, which would implement recommendations 3.10, 7.8 and 7.9 (in part). The Chief

² “Implemented” means that the Department’s implementation of the recommendation has been reviewed and approved by the Monitor, and the reforms have been incorporated into jail operations.

³ “Partially Implemented” means that the Department has implemented the recommendation, but some additional steps are required to complete the implementation.

⁴ “In progress” means that the Department is assessing the policy, procedural and operation needs and/or is in the process of implementing the recommendation.

⁵ “Funding Request” means that the Department has submitted a funding request to implement additional Commission recommendations.

⁶ The status of the Commission’s funding requests is attached as Appendix 3 and the status of the remaining recommendations is attached as Appendix 4.

Executive's Office has reviewed these requests and recommended approval by the Board. The Chief Executive's Office also has recommended approval by the Board of funding for an initial 25 additional sergeants to enhance supervision in the Department's Custody Operations. These requests are under review by the Board's offices.

The Department has also submitted to the Chief Executive's Office its detailed support for 1) additional resources for its Internal Affairs Bureau (IAB), Internal Criminal Investigations Bureau, Advocacy Bureau, and Internal Investigations Division; 2) a new Inspectional Services Command; and 3) a total of 97 additional sergeants and two additional lieutenants. The Consultants and I have reviewed and approved these funding requests, which are now under review by the CEO. The Department has also submitted to the CEO its support for an upgraded Data Tracking System, which is under review by the CEO and the Chief Information Officer.

Finally, the Department has submitted a request for funding for additional closed circuit television cameras for the jail facilities, which the Board's Consultants have reviewed. Their analysis is set forth below in connection with Recommendation 7.15 pertaining to the enhanced use of lapel cameras.

IMPLEMENTATION STATUS

CHAPTER 3: USE OF FORCE

On January 1, 2013, the Department promulgated a new Use of Force Policy (the "Force Policy"). Pursuant to the Commission's recommendations, the Department distributed to each Deputy Sheriff and Custody Assistant a comprehensive Use of Force Manual (the "Force Manual") relating to the use and reporting of force by Department personnel. The Department's revised Force Manual was published on July 22, 2013.

The following summarizes the status of the Department's implementation of each of the Commission's specific Use of Force recommendations:

3.1. LASD should promulgate a comprehensive and easy-to-understand Use of Force Policy in a single document.

Implemented

The Department's Use of Force policies are set forth in a single Force Manual (revised) that reflects (1) overall principles, including force prevention principles and an anti-harassment policy; (2) provisions providing guidance regarding use of force; (3) lists of approved weapons; and (4) requirements for the reporting of uses of force.

3.2. LASD personnel should be required to formally acknowledge, in writing, that they have read and understand the Department's Use of Force Policy.

Implemented

The Department has created an Acknowledgement and Agreement Form that each Deputy Sheriff and Custody Assistant is required to sign.

3.3. All LASD personnel should be provided training on the new Use of Force Policy.

Implemented

The Department reports that over 98% of sworn personnel have received training in the new Use of Force Policy.

3.4. The Department's Use of Force Policy should reflect a commitment to the principles of the Force Prevention Policy and prohibit inmate retaliation or harassment.

Implemented

The MPP and the Custody Division Manual set forth the principles of the Force Prevention Policy, and the Custody Division Manual prohibits retaliation against, or harassment of, inmates. These sections are included in the Force Manual.

3.5. LASD's Use of Force Policy should be based upon the objectively reasonable standard rather than the Situational Use of Force Options Chart.

Implemented

Sections 3-10/020.00 and 3-10/030.00 of the MPP reflect the objectively reasonable standard, and references to the Situational Use of Force have been deleted in the revised Force Manual. Pursuant to the Consultants' recommendation, Section 3-02/035.05 of the Custody Division Manual includes references to the factors set forth by the United States Supreme Court in *Hudson v. McMillian*, 503 U.S. 1 (1992) relating to the use of force in a custody setting.

3.6. The Use of Force Policy should articulate a strong preference for planned, supervised, and directed force.

Implemented

The Force Prevention Policy set forth in the MPP and the Custody Division Manual generally reflects a preference for planned, supervised, and directed force. In addition, the Department has added Section 3.02/035.10 to the Custody Division Manual, which reads as follows: "When force is required, every effort shall be made to plan, supervise, and direct force in an effort to control confrontations in a calm and professional manner."

3.7. The Use of Force Policy should account for the special needs populations in the jails.

Implemented

The Department has added Section 3-02/035.15 to the Custody Division Manual, which reads as follows: "If a situation arises involving a special needs inmate, the appropriate mental health staff should be consulted, whenever possible, prior to the planned use of force." In addition, there are provisions in the Force Manual relating to

pregnant inmates and the Jail Mental Evaluation Team that further implement this recommendation.

3.8. PPI and FAST should be replaced with a single, reliable, and comprehensive data tracking system.

In progress (funding requested)

On March 28, 2013, the Department submitted a funding request to the Chief Executive's Office for \$3.0 million to upgrade the Personnel Performance Index ("PPI") to "captur[e] inmate complaint information and satisfy current reporting requirements." On August 5, 2013, it submitted to the CEO its detailed support for this request to upgrade the PPI system. The request is under consideration by the CEO in consultation with the Chief Information Officer, who is working with the Department to reevaluate the Department's Information Technology needs and options.

3.9. Inmate grievances should be tracked in PPI by the names of LASD personnel.

In progress

The Department reports that it "has completed development of the PPI module that will enable it to track inmate grievances against staff," but that it has identified "flaws in the security framework" that "will require refinement prior to the module's implementation." The Department "expects to complete the security modification and implement the recommendation" before my November report to the Board. In the interim, the Department is tracking the grievances in FAST, which can generate three different reports to track inmate grievances against individual deputies (and Custody Assistants).

3.10. LASD should analyze inmate grievances regarding the use of force incidents.

Partially implemented (funding requested)

The Department has established the position of Risk Management Lieutenant in the Custody Training and Standards Bureau to implement this recommendation to analyze inmate grievances at the Custody Division level. The Department also has established the position of Inmate Grievance Coordinator, who will review and analyze inmate grievances, including grievances regarding force. (*See Recommendation 7.14.*)

On July 22, 2013, the Chief Executive Officer recommended that the Board approve the Department's funding request for six Compliance Lieutenants, who will review and analyze inmate grievances at the unit level. This request is under review by the Board offices.

3.11. Statistical data regarding use of force incidents needs to be vigilantly tracked and analyzed in real time by the highest levels of LASD management.

Implemented.

Department personnel have provided me with daily and monthly statistical reports and monthly force analysis used by Department managers to track and analyze use of force incidents in the jails.

3.12. Department should purchase additional body scanners.

In progress

Funding has been approved for additional body scanners. The Department reports that an initial two body scanners should be installed by mid-November and that it expects to purchase a total of between 20 and 22 body scanners.

CHAPTER 4: MANAGEMENT

The Sheriff has extensively re-organized the management of the Department. The Department now has four Assistant Sheriffs who are responsible for overseeing Custody Operations, Patrol Operations, Countywide Services, and Administration & Professional Standards, and who report directly to the Sheriff. The Sheriff also has appointed a Chief of Staff and a Chief of a new Internal Investigations Division, who report directly to him.

Following the Commission's recommendation, the Sheriff appointed an Assistant Sheriff who is responsible for only the Department's Custody Operations. She has reorganized the Custody Division into a Custody Services Division – General Population and a Custody Services Division – Specialized Programs under Chiefs who report directly to her. An Administrative Commander who has been responsible for the implementation of the Commission's recommendations also reports directly to her.

The Department has completed its Administrative Investigations, and the four high level managers who directly or indirectly had supervision over the jails during the periods reviewed by the Commission have now all left the Department.

Set forth below are summaries of the Department's implementation of each of the Commission's Management recommendations.

4.1. The Sheriff must be personally engaged in oversight of the jails.

Implemented

Since the formation of the Commander Management Task Force in October 2011, the Sheriff has been personally directing the reform of the jails. In our meetings, he has

assured me that he intends to remain engaged in the oversight of the jails through regular communications with the new Assistant Sheriff for Custody Operations.

4.2. The Sheriff must hold his high level managers accountable for failing to address use of force problems in the jails.

Implemented.

Since the Commission was created by the Board in October 2011, four high level managers who had direct or indirect oversight of the jails when many of the problems identified by the Commission occurred have left the Department. During this period, the Department conducted Administrative Investigations of allegations of misconduct by two managers that arose out of the Commission's hearings. The Department provided me with access to these investigations, which I found to be thorough and complete. I believe, however, that it took too long to complete one of the investigations because the investigator did not have sufficient support and/or resources.

The Department's investigations resulted in "founded" findings against both managers as well as additional "unfounded" and "unresolved" findings against one of the managers. I generally agreed with the Department's findings, although one I believe that one "unfounded" finding should have been at least an "unresolved" finding. It appears that the results of one of the investigations caused the manager to retire from the Department. It is not clear that the other investigation had any impact on the decision of the other manager to leave the Department. It appears, however, that the management changes that the Sheriff made as a result of the Commission's recommendations directly or indirectly caused at least two of the managers to leave the Department.

Personnel decisions are among the most difficult issues to discuss and assess publicly. Such matters implicate the rights of employees generally and California state

law limits what I can publicly disclose concerning peace officers' personnel and disciplinary information. Based upon the Sheriff's management changes (both in terms of structure and personnel), the results of the Administrative Investigations, and the timing of the retirements of the four managers who had oversight responsibility over the jails, it is generally perceived in the Department that these managers retired, at least in part, due to their failures to address adequately the use of force problems in the jails. Although I believe that the process took too long – the high level managers retired over the period from March 2012 through August 2013 – at this point there is nothing further for the Department to do in order to hold these managers accountable and implement this recommendation.

4.3. The Undersheriff should have no responsibility for Custody operations or the disciplinary system.

Implemented

In January, the Sheriff issued "Sheriff's Bulletin #593" entitled "Executive Reporting Procedures" to implement this recommendation. Under the reorganization, the Assistant Sheriff for Custody Operations reports directly to the Sheriff. IAB and ICIB now report to the Sheriff through the recently appointed Chief of the Internal Investigations Division. Further, as noted, the Undersheriff retired on August 1, 2013.

4.4. The Department should create a new Assistant Sheriff for Custody position whose sole responsibility would be the management and oversight of the jails.

Implemented.

The Sheriff has appointed an Assistant Sheriff who is responsible for Custody Operations. She assumed her duties on March 18, 2013. Effective July 1, 2013, she reorganized the Custody Division into two Custody Services Divisions, one for General

Population and one for Specialized Programs. Each of the Divisions is headed by a Chief who reports directly to the Assistant Sheriff for Custody Operations.

- 4.5. The Sheriff should appoint as the new Assistant Sheriff for Custody an individual with experience in managing a large corrections facility or running a corrections department.**

Implemented.

The Sheriff interviewed the top tier candidates and appointed an Assistant Sheriff for Custody Operations who has extensive experience in running a corrections department.

- 4.6. The Assistant Sheriff for Custody should report directly to the Sheriff.**

Implemented

“Sheriff’s Bulletin #593” entitled “Executive Reporting Procedures” provides that each of the Assistant Sheriffs, including the Assistant Sheriff for Custody Operations, reports directly to the Sheriff.

- 4.7. The Commander Management Task Force should not be a permanent part of Custody management.**

Implemented

The Sheriff’s Bulletin #593 and the new organization charts do not include a role for the Commander Management Task Force in Custody management.

- 4.8. The Sheriff must regularly and vigilantly monitor the Department’s Use of Force in the jails.**

Implemented

Since at least the formation of the Commander Management Task Force in October 2011, the Sheriff has been monitoring the level of force in the jails. He has

assured me that he intends to remain engaged in oversight of the jails through regular communications with the new Assistant Sheriff for Custody Operations.

4.9. The Department should implement SCIF [the Sheriff's Critical Incident Forum] on the Custody side to improve the accountability of jail supervisors.

Implemented

This recommendation has been implemented pursuant to a Custody Division Directive, dated December 13, 2012, issued by the then Chief of the Custody Division. A Custody Division SCIF took place on February 12, 2013, to review statistics relating to the operations of the Custody Division. The next SCIF for Custody Operations is scheduled for October 17, 2013.

4.10. Senior management needs to be more visible and engaged in Custody.

Implemented

The Department has amended the job descriptions in the Custody Division Manual so that they now require the Assistant Sheriff - Custody Division, the Custody Division Chiefs, the Area Commanders, and the Jail Captains to "maintain a visible presence within the [assigned] jail facilities to help ensure proper adherence to policy and the application of the Department's Core Values." Unit Commanders have advised me that they regularly walk through the jail facilities and senior management personnel have confirmed that they regularly visit the jail facilities. The Assistant Sheriff for Custody Operations also has advised me that she and her Division Chiefs and Commanders regularly walk through the jail facilities.

4.11. Management should be assigned and allocated based on the unique size and needs of each facility.

In progress (funding request anticipated)

The Department is analyzing the operations staff of each of the jail facilities and anticipates needing additional funding. I have received, reviewed and commented on a draft of the analysis for the East facility that will provide the framework for the analysis of the remaining facilities. The Department still expects to complete the facilities assessment by October 2013.

4.12. LASD should create an Internal Audit and Inspection Division.

In progress (funding requested)

On June 3, 2013, the Department presented its final proposal for the Inspectional Services Command, which the Consultants and I endorsed, and which I submitted to the CEO on June 7, 2013. On June 28, 2013, the Department submitted detailed Duty Statements and a Budget Request Worksheet for the Inspectional Service Command proposal directly to the CEO. The Department and I met with the CEO and a representative of the County's Auditor-Controller on July 23, 2013. The proposal is still under review by the CEO.

4.13. The Department should have a formal policy to address campaign contributions.

Implemented

On January 31, 2013, the Department issued revised Section 3-01/070.05 (Political Activity) and Section 3-01/070.07 (Prohibited Political Activity and Other Conflicts of Interest) of the MPP.

4.14. LASD should participate in collaborations such as the Large Jail Network that would enable it to learn about best practices and approaches in other systems.

Implemented

The Department has joined the Large Jail Network. Members of the Custody Division attended the American Jail Association National Training Conference in May and the Southern California Jail Managers earlier this year.

CHAPTER 5: CULTURE

As noted in my earlier reports, the Department has emphasized respect for and communications with inmates through the Force Prevention Policy, the Education Based Incarceration program, and Town Hall meetings. It has enhanced the training of new Custody Division personnel in the principles of the Force Prevention Policy, ethics, and destructive cliques, and it has submitted to the Chief Executive's Office its proposal for a Custody Training and Standards Bureau that will provide additional training to current Custody deputies and Custody Assistants. It also has established a Dual Track Career Path that will provide deputies with an opportunity for a career in the Custody Division. The Department has also enhanced the penalty guidelines for dishonesty to further address the culture problems identified by the Commission. Finally, each facility has developed a rotation policy taking into consideration its size, configuration, and inmate population.

Set forth below are summaries of the Department's implementation of each of the Commission's recommendations regarding the culture in Custody Operations.

5.1. The Department must continue to implement reforms that emphasize respect for, engagement of, and communications with inmates.

Implemented

Based upon my conversations and meetings with the Sheriff and with members of the Command staff and Unit Commanders; my review of policies, directives, and reports; my tours of jail facilities; and input from the Consultants and outside observers, it is apparent that the Department is committed to implementing the reforms recommended by the Commission, enhancing respect for and communications with inmates, and changing the culture in the Custody Division. In the recent Commanders meeting I attended, the Chiefs of the Custody Divisions emphasized the Education Based Incarceration program and Force Prevention Principles. The changes in the culture are reflected in the principles set forth in the Force Prevention Policy, the Anti-harassment Policy, the Education Based Incarceration program, the numerous Town Hall meetings with inmates, the Department's responses to inmate grievances, and its progress in implementing the Commission's recommendations.

5.2. The Department's Force Prevention Policy should be stressed in Academy training and reiterated in continuing Custody Division training.

Partially implemented (funding requested)

This recommendation has been implemented for new deputies, and 98% of the existing staff has received training in the new Use of Force Policy, which incorporates the Force Prevention Principles. What remains is setting up a formal Custody Training and Standards Bureau to enhance continuing training of the existing Custody staff. (See Recommendation 6.3).

5.3. The Department should enhance its ethics training and guidance in the Academy as well as in continuing Custody Division training.

Partially implemented (funding requested)

Academy training covers “Department Ethics and Standards,” including “CORE Values” and “Critical Decision Making” and the Jail Operations Continuum covers “Valued Communications” and “Value Based Decision Making.” Additional ethics training will be provided to the existing staff through the Custody Training and Standards Bureau the Department is creating. In the interim, the Department will roll-out blocks of training to enhance ethics training for the existing staff.

5.4. The Department must make Custody a valued and respected assignment and career.

Implemented.

Sheriff’s Bulletin # 594, dated February 1, 2013, announced that the Department has established a Dual Track Career Path that allows new recruits to select a career in Custody and allows Deputy Sheriffs currently assigned to Custody to remain in Custody assignments. It also allows Deputy Sheriffs and supervisors to promote up to the position of Chief of the Custody Division without going out to a patrol assignment.

5.5. Senior leaders must be more visible in the jails.

Implemented.

The Department has amended the job descriptions in the Custody Division Manual so that they now require the Assistant Sheriff - Custody Division, the Custody Division Chief, the Area Commanders, and the Jail Captains to “maintain a visible presence within the [assigned] jail facilities to help ensure proper adherence to policy and the application of the Department’s Core Values.” (See Recommendation 4.11 above.)

5.6. LASD must have a firm policy and practice of zero tolerance for acts of dishonesty that is clearly communicated and enforced.

Implemented

New disciplinary guidelines were published on February 17, 2013, that enhance the penalties for dishonesty.

5.7. The Department should have a sensible rotation policy to protect against the development of troubling cliques.

Implemented

As a result of my meetings with a Working Group formed by the Department, it was decided that, instead of a single rotation policy for the entire Custody Division, the Unit Commanders would develop their own rotation policies for each of the facilities. The policies would rotate deputies who regularly have contact with inmates, including deputies in “key positions,” among job assignments to address the Commission’s concern about deputy cliques, taking into consideration the facility’s size, configuration and inmate population to ensure the safety and security of the staff and inmates. Following these meetings each of the Unit Commanders issued a unit directive rotating deputies among job assignments in each facility.

As a result of the Assistant Sheriff’s reorganization of the Custody Operations, some of the jail facilities have new Unit Commanders. On July 25, 2013, I met with the Unit Commanders and asked them to review the rotation policies for their facilities and either reaffirm the policy or make adjustments as appropriate.

5.8. LASD should discourage participation in destructive cliques.

Partially implemented (funding requested)

The subject of destructive cliques is covered for new Deputy Sheriffs in the Jail Operations Continuum. Additional training will be provided to other Custody personnel through the Custody Training and Standards Bureau that the Department is in the process of creating. Further, each of the jail facilities has a rotation policy that is intended to discourage participation in destructive cliques.

CHAPTER 6: PERSONNEL AND TRAINING

The Department has submitted to the Chief Executive's Office proposals to create a Custody Training and Standards Bureau that will develop a robust post-Academy training program for both new and existing personnel. The CEO has now recommended to the Board approval of funding for 33 personnel to staff this bureau.

Under the directions of the Assistant Sheriff for Custody Operations, the Department has conducted a comprehensive analysis of the Custody Division staffing and supervision to determine the number of additional supervisors it needs in each of the jail facilities and submitted a proposal for an 97 sergeant items and 2 lieutenant items. The Consultant and I have evaluated the Department's request, and I have submitted the proposal and our analysis to the CEO. In the interim, the CEO has recommended that the Board approve 25 supervisory positions. The Department has also frozen Deputy Sheriff positions to increase in the ratio of Custody Assistants to Deputy Sheriffs to achieve the agreed upon 65/35 ratio.

The Department's implementation of the Commission's specific Personnel and Training recommendations are set forth below.

6.1. The Department should review and revise its personnel and training procedures to reflect Custody's status as a valued and important part of the Department.

Partially implemented (funding requested)

The Dual Track Career Path was established on February 1, 2013. In addition, the Department has expanded its Custody training through the Jail Operation Continuum, and it is in the process of creating a Custody Training and Standards Bureau that will develop a comprehensive training program for Custody Operations.

6.2. The Department should develop and implement a long-range and steady hiring plan based upon normal attrition.

Implemented

A Sworn Vacancy Projection submitted by Personnel Administration to the Commander Management Task Force on October 2, 2012 reflects "a strategic plan to consistently hire deputies through 2017" to fill vacancies and hire additional deputies based upon normal attrition. It will be subject to the availability of the funding in the future to hire new deputies.

6.3. Deputies and supervisors should receive significantly more Custody specific training overseen by the Department's Leadership & Training Division.

Partially implemented (funding requested)

The Department has implemented this recommendation for new deputies and is in the process of implementing this recommendation for experienced deputies and supervisors. Consistent with the long-term goal of setting up a separate Custody Division (*see Recommendation 6.10*) and the Dual Track Career Path, the Department has proposed to enhance significantly the training of Custody personnel through the creation of a new Custody Training and Standards Bureau, which will oversee post-Academy

training of Custody personnel. On July 22, 2013, the CEO recommended to the Board approval of funding for 33 positions to staff this bureau. The Department anticipates that it will complete the staffing of the bureau within six months after the Board approves the CEO's funding recommendation.

6.4. There should be a meaningful probation for new deputies in Custody.

Implemented

Effective January 11, 2013, Custody Division Directive 12-005 provides that “at the completion of the employee’s sixth month” of employment, the shift Lieutenant will be conducting “a thorough inquiry of the employee’s personnel performance.” Thereafter, “three or four weeks prior to the employee’s one year anniversary the Unit Commander or designee shall conduct another personnel performance review and schedule a face to face meeting.” Before an employee can complete probation, the Unit Commander is supposed to “draft a memorandum to memorialize the employee’s successful completion of the probationary period.”

6.5. The number of supervisors to deputies should be increased and the administrative burdens on Custody supervisors should be minimized.

In progress (funding requested)

At the direction of the new Assistant Sheriff for the Custody Division, the Department has conducted a comprehensive review of the staffing and supervision in each of the jail facilities for each shift for each day of the week. The Department has submitted a request for an additional 97 sergeant “items”⁷ and two lieutenant items. The request was supported by a detailed analysis showing the current 7 day/24 hour staffing for each of the facilities and where each additional sergeant supervisor would be assigned

⁷ An “item” is the personnel needed to staff a position seven days a week.

by facility, location, day, and shift. I submitted the Department's request to the Consultants for their analysis. The Consultants requested additional information, which the Department provide last month. The Consultants and I then completed our evaluation of the Department's proposal, which I submitted to the CEO on July 26, 2013. In the interim, while the comprehensive proposal is under review, the CEO has recommended that the Board approve funding for 25 supervisory positions.

6.6. The Department should allow deputies to have a career in Custody and take steps in the interim to decrease the length of new deputy assignments to Custody.

Implemented

The Dual Track Career Path established on February 1, 2013, allows deputies to have a career in Custody and to promote from within Custody Operations.

6.7. The Department should utilize more Custody Assistants.

Partially implemented

The Department froze 81 identified Deputy Sheriff positions, and it reports that it has now achieved the 65/35 ratio provided in the Memorandum of Understandings with the Deputy Sheriffs' union (ALADS) and the Custody Assistants union (PPOA). The Department reports that it is "conducting further position analysis to determine the feasibility of moving beyond the 35/65 percent ratio and hopes to have the analysis done by December." Any change in the 65/35 ratio would be subject to "meet and confer" obligations with ALADS and PPOA.

6.8. Rotations within and among proximate facilities should be implemented.

Implemented

As discussed above (see Recommendation 5.7), the Department has implemented rotation policies in each of the facilities. It reports that it was not able to implement a voluntary rotation among the north county facilities, and that it would need the agreement of the deputies' union to implement rotations among the facilities. Beginning with the graduation of the next Academy class, however, it is planning to rotate newly assigned deputy sheriffs at the beginning of their fourth month of training to "a proximate facility" in the south or in the Pitchess Detention Center in the north so that all new deputies will have experience in more than one facility. This does not require agreement of the deputies' union to implement.

6.9. The Department's Mission Statement should be changed to reflect the importance of Custody.

Implemented

6.10. The Department should create a separate Custody Division with a professional workforce.

In progress

This is a long-term goal that the Department has begun to address. The Sheriff has selected a new Assistant Sheriff for the Custody Division and implemented the Dual Track Career Path on February 1, 2013. Establishing a Custody Training and Standards Bureau and increasing the ratio of Custody Assistants to Deputy Sheriffs will further implement this recommendation, but given the number of deputies who are hired each year, it will take several years before the Custody Division could be staffed exclusively

with new deputies who want careers in Custody and new deputies who want careers in patrol would be able to go directly to patrol.

CHAPTER 7: DISCIPLINE

The Department is in the process of revamping its investigative and disciplinary system, which will increase the number of force investigations by the Internal Affairs Bureau. The Sheriff has created an Internal Investigations Division and appointed a Chief of the Division to oversee the Internal Affairs Bureau (“IAB”) and the Internal Criminal Investigations Bureau (“ICIB”). The Department also has enhanced the penalties for dishonesty and excessive force, and the Custody Force Review Committee is rigorously reviewing Use of Force Packages. In addition, the Force Manual has now been revised to clarify the policies with respect to the review of videotaped footage and the separation of deputies involved in force incidents.

The Department has requested funding for additional resources for IAB and ICIB and for Compliance Lieutenants who would be assigned to each jail facility with one covering both the North and South facilities. On July 22, 2013, the CEO recommended to the Board approval of the Department’s request for six Compliance Lieutenants. The Department also has provided to the CEO detailed support for its request for additional ICIB and IAB resources. This request is under review by the CEO.

Set forth below are summaries of the Department’s implementation of each of the Commission’s Discipline recommendations.

7.1. The investigative and disciplinary system should be revamped.

In progress (funding requested)

The Department is in the process of implementing this recommendation. I have

had a number of meetings with a Commander regarding this recommendation, and we have agreed on revamping the investigative system so that IAB will conduct all Administrative Investigations of Category 2 force incidents in addition to in addition to conducting the Administrative and Force Investigations of all incidents involving serious injuries (Category 3 force incidents).

The Consultants and I have had a number of meetings and conversations with the Department to review their requests for additional resources for IAB and ICIB as well as the Internal Investigation Division headquarters and the Advocacy Unit that advises and represents the Department in connection with disciplinary matters. On May 2, 2013, I submitted a memorandum to the Chief Executive's Office setting forth an analysis of the Department's requests and the Consultants' recommendations. The Department provided the CEO with detailed support for additional resources for ICIB, the Advocacy Bureau, and IAB. On July 22, 2013, the CEO recommended to the Board approval of funding for six Compliance Lieutenants requested by the Department. These Compliance Lieutenants will conduct Administrative Investigations of Category 1 force incidents under the revamped investigatory system. (*See Recommendation 7.8.*)

7.2. The CFRC [Custody Force Review Committee] should monitor Force Packages for trends and concerns and the performance of supervisors.

Implemented

One of the Consultants attended CFRC meetings on "two different occasions and he watched the process of evaluation and follow-up related to the incidents involving several different force incidents." He advised me that he was "impressed with the manner in which candid and direct examinations of Captains, Lieutenants, and Sergeants [who were] responsible for [the] force incidents takes place." The CFRC assesses,

among other things, “whether the force response was reasonable to the threat perceived” and “whether there may have been a force response of lesser magnitude more appropriate to the threat.” He further reported that “[i]n my experience, the establishment of standard and expectations by the executive management is the first step in changing a culture. The CFRC is clearly a big part of that proposition as it pertains to the use of force in the jails.”

I attended a CFRC meeting on March 13, 2013, and also was impressed with the depth of analysis and the way in which the CFRC holds the unit supervisors responsible for the quality of their force reviews.

7.3. Deputies should be required to provide a timely written report of force incidents and not be allowed to review video tape footage prior to the completion of that report or any interviews.

Implemented

The revised Force Manual (Sections 3-10/100.00 and 3-10/115.00 of the MPP) sets forth these requirements.

7.4. Deputies involved in Significant Force incidents should be separated and not permitted to talk to each other until they have provided a written statement or have been interviewed by investigators.

Implemented

The revised Force Manual (Section 3-10/110.00 of the MPP) sets forth this requirement.

7.5. IAB and ICIB should be part of an Investigation Division under a Chief who would report directly to the Sheriff.

Implemented

The Department implemented this recommendation on March 1, 2013, effective March 3, 2013. The Department has submitted a detailed proposal to the CEO for additional administrative resources for its Internal Investigations Division.

7.6. IAB should be appropriately valued and staffed by personnel that can effectively carry out the sensitive and important work of that bureau.

Partially implemented (funding requested)

The Department has provided information showing that IAB investigators have often been promoted from IAB. The Department still needs to increase the number of IAB investigators. As noted above, the Department has submitted proposals to increase the staffing for the IAB and ICIB. (See Recommendation 7.1.)

7.7. The Disciplinary Guidelines should be revised to establish increased penalties for excessive force and dishonesty.

Implemented

The Department has implemented this recommendation by enhancing penalties for excessive force and dishonesty.

7.8. Each jail should have a Risk Manager to track and monitor use of force investigations.

In progress (funding requested)

The Department has submitted detailed support to CEO for the funding for Compliance Lieutenant positions. These Lieutenants will conduct Administrative Investigations of Category 1 Force Incidents, analyze inmate grievances regarding force in each facility, and monitor and track force investigations. As noted above, the CEO has recommended that the Board approve funding of six Compliance Lieutenants.

7.9. Force investigations should not be conducted by deputies' supervisors.

In progress (funding requested)

Under the revamped investigative system, if the Unit Commander determines that a use of force may have violated Department policy or involved misconduct, the Administrative Investigation of a Category 2 Force Incident (involving injuries to

inmates) will be conducted by the Internal Affairs Bureau and the Administrative Investigation of a Category 1 Force Incident (no injury) will be conducted by the Compliance Lieutenants who will not be supervising any of the deputies.

7.10. Captains should not reduce charges or hold penalties in abeyance for use of force, dishonesty, or failure to report force incidents.

Implemented

The Department's penalty guidelines effective February 17, 2013, require suspension days (that is, penalties without pay), and preclude Education Based Discipline (that is, holding suspension days in abeyance), for dishonesty, excessive use of force, or failure to report force. The Department implemented a new management protocol effective September 1, 2013, that requires captains hearing employee grievances to consult with senior Department officials and the Office of Independent Review and they must articulate a factual and legal basis prior to modifying any findings and/or recommended discipline for dishonesty, excessive force, or failure to report force.

7.11. The Department should vigorously investigate and discipline off-duty misconduct.

Implemented

The Department has provided me with a report of the results of investigations and the discipline imposed for off-duty misconduct from the beginning of the second quarter of 2011 through the end of the second quarter of 2012, which confirms that this recommendation has been implemented.

7.12. The Department should implement an enhanced and comprehensive system to track force reviews and investigations.

Implemented

The Department has demonstrated for me that the Electronic Line Operations Tracking System (e-LOTS) is a comprehensive system that can be used to track force reviews and investigations. It has now implemented a policy that requires all custody facilities to use e-LOTS to track Use of Force packages. Each Unit Commander is required to “ensure that all necessary information about each force incident [is] entered into e-LOTS prior to the end of the shift in which the incident occurred,” and the Unit Commander or Operations Lieutenant is required to track in e-LOTS on a weekly basis all force reviews and contact the appropriate supervisor “if the preparation or review of the Force Package is overdue.” Eventually, e-LOTS will be replaced by CARTS, which will be used to track force reviews and investigations.

7.13. Inmate Complaints should be tracked by deputies’ names in PPI.

In progress

The Department now anticipates that it will be able to track inmate grievances by deputies’ names in PPI by November 2013. As noted above, in the interim the Department is tracking the grievances by deputies’ names in FAST.

7.14. The inmate grievance process should be improved and include added checks and oversight.

Partially Implemented

The Department is working to enhance the inmate grievance process, including a system for inmates to submit grievances on IPADS and for tracking electronically the Department’s handling of the grievances.

The Department has amended its policies to require Unit Commanders to review all personnel complaints and all complaints of retaliation, which are forwarded to Custody Operations headquarters and the Office of Independent Review, reviewed by a commander at the direction of the Chief of the Division, and forwarded to the appropriate unit to handle. All allegations of retaliation are to be entered into the FAST system.

The Department had appointed an Inmate Grievance Coordinator at the rank of lieutenant who will oversee the Department's handling of inmate complaints. The Coordinator will conduct monthly reviews of all units within the Custody Division to ensure compliance with the Department's policies and procedures regarding inmate requests for service and personnel complaints. The Unit Commanders will respond to any findings of irregularities and the Coordinator will report his or her findings to the Division's Risk Management Lieutenant and senior management.

The Department also intends to audit the inmate grievance system twice a year by Custody Division Commanders and once a year as part of the Command Inspections.

The Department is developing a pilot program beginning November 1, 2013, whereby inmates in trustee dorms in Men's Central Jail and CRDF will have access to IPAD kiosks that will allow them to submit their requests for service and personnel complaints to the Department electronically. The request/grievance will be routed to the personnel assigned the responsibility for responding (for example, in the case of a grievance against a deputy, it would automatically go to the deputy's supervisor), and there would be a universal tracking system. The Department will also be able to run exception reports to determine if the service requests have been fulfilled or the grievances investigated and addressed, and it will be able to track grievances (and types of

grievance) by deputy. If the pilot program is successful and funding is available, the Department intends to implement the system Division-wide possibly within 14 months after completion of the pilot program.

7.15. The use of lapel cameras as an investigative tool should be broadened.

In progress (funding requested)

In response to the recommendation of the Board of Supervisors, and also the Commission's encouragement, the Department "conducted a test and evaluation of representative forms of PVRDs ["Personal Video Recording Devices"] within MCJ and TTCF in order to assess the feasibility of implementing a larger scale deployment of PVRD technology at LASD." The Department's report "recommends a deployment of PVRDs exclusively at Men's Central Jail due to its prominence, historically higher liability operation, hazardous inmate classifications and overall impact such a deployment would have on the entirety of the Department." Taking into consideration the considerable potential costs, the Department recommends an initial deployment that is "manageable in size, scalable in scope and should necessitate a minimal need for additional infrastructure upgrades." The Report also identifies several issues that still need to be addressed in the development and implementation of a PVRD policy, including working with the unions to gain acceptance of the use of the technology, whether it is a voluntary or mandatory program, and "cost model and options for network infrastructure versus cloud storage solutions." Ultimately, the Department believes that the funds for lapel cameras would be better spent on additional fixed cameras in the jails.

The Department has submitted to the CEO a request for funding for additional fixed CCTV cameras to "enhance[] the system at MCJ, TTCF, and IRC, as well as to

expand it to all of the other custody facilities.” This proposal is essentially in lieu of additional lapel cameras because the “Department believes that the risk of investing in a technology that is rapidly evolving would likely mean that whatever product is purchased may be outdated before it is even deployed.” The CEO asked the Consultants and me to evaluate the Department’s request.

The Consultants believe that “[e]xpanded placement of CCTV cameras is needed, irrespective of any future decision to equip Deputies with PVRDs” and “there is a definite need for more cameras with better resolution to improve coverage and the quality of video recordings.” They “believe that the greatest need for the CCTV system is at the MCJ, IRC and the TTCF because the majority of use of force incidents happen in these facilities” and that the “fixed camera system, in conjunction with audio recording capabilities can be expanded at a more reasonable cost than full deployment of PVRDs would require.” With respect to PVRDs, they “feel that the Department would benefit from a . . . limited and targeted testing in the jails” that could “be carried out in particular settings and situations such as controlled cell extractions or similar tactical deployments.”

The Consultants “concur with the Sheriff’s proposal in terms of the number of CCTV cameras being requested and the placement of those cameras in Men’s Central Jail, the Twin Towers Correctional facility and the Inmate Reception Center,” but they did not undertake their own evaluation of the number and placement of cameras in the other facilities. Finally, they strongly urge that “audio recording capabilities be include in the proposal,” which “would provide a strong complement to the CCTV system [and] give a more complete picture of the incidents being review[.]”

CHAPTER 8: OVERSIGHT

8.2. The Department should report regularly to the Board of Supervisors on use of force and the status of Custody recommendations.

Implemented

Since the formation of the Commander Management Task force in October 2011, the Sheriff and/or the Assistant Sheriff for Custody Operations has regularly reported to the Board on the use of force in the jails and the implementation of the Commission's recommendations.

CONCLUSION

The Sheriff and the Department have continued to cooperate fully with me and to work with the CEO towards implementation of the remaining recommendations that involve resource allocations and funding decisions. The implementation of these recommendations will depend on the timing and extent of CEO's funding recommendations and the Board's approval of the recommendations. The remaining recommendations that do not require funding should be completed by the end of the year, if not sooner.

Appendix 1

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
			IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
USE OF FORCE	3.1	Comprehensive and easy-to-understand Use of Force policy in single manual	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.2	LASD personnel should be required to read and understand the new UOF policy	X				LASD implemented January 1, 2013.
	3.3	LASD personnel should receive training on the new UOF policy	X				On-going
	3.4	The Use of Force policy should reflect Force Prevention and anti-retaliation policies	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.5	The Use of Force policy should be based upon objectively reasonable standard	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	3.6	The Use of Force policy should reflect preference for planned, supervised, and directed force	X				Manual revised June 24, 2013
	3.7	The Use of Force policy should account for special needs populations	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.8	LASD should have a single, reliable and comprehensive data tracking system			X		Funding request for PPI submitted by LASD; Consulting with Chief Information Office
	3.9	Inmate grievances should be tracked in PPI by names of LASD personnel			X		Estimated revised completion date of November 2013.
	3.10	LASD should analyze inmate grievances regarding use of force incidents		X			Implemented at Division level. Compliance Lieutenants requested to implement at Unit level.
	3.11	Use of force statistical data must be tracked and analyzed in real time by management	X				On-going
	3.12	LASD should purchase additional body scanners			X		Installation November 2013
12 USE OF FORCE RECOMMENDATIONS:			8	1	3	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
			IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
MANAGEMENT	4.1	Personal engagement by Sheriff in oversight of jails	X				On-going
	4.2	High level managers must be accountable for failing to address use of force problems	X				Admini investigations completed; responsible high level managers resigned/retired
	4.3	The Undersheriff should not have any responsibility for custody or discipline	X				Sheriff's Bulletin issued (January 7, 2013)
	4.4	LASD should create a new Assistant Sheriff position for Custody	X				New Assistant Sheriff for Custody appointed.
	4.5	The Sheriff should appoint a new Custody Assistant Sheriff with corrections experience	X				New Assistant Sheriff for Custody appointed.
	4.6	The Custody Assistant Sheriff should report directly to the Sheriff	X				Sheriff's Bulletin issued (January 7, 2013)
	4.7	The Commander Management Task Force should not be a part of Custody management	X				Sheriff's Bulletin issued (January 7, 2013)
	4.8	The Sheriff must monitor the use of force in the jails	X				On-going
	4.9	LASD should utilize the Sheriff's Critical Incident Forum (SCIF) in Custody	X				December 13, 2012. Custody Division Directive.
	4.10	Senior management must be more visible in the jails	X				Position description amended.
	4.11	Operations support should be allocated based unique needs of each facility			X		Facilities assessment expected October 2013. Funding anticipated.
	4.12	LASD should created an Internal Audit and Inspection Division under a single Chief			X		Implementation plan developed and submitted to CEO. Funding requested
	4.13	LASD should have a policy regarding campaign contributions	X				Implemented January 31, 2013
	4.14	LASD should participate in the Large Jail Network	X				Attended May meeting
14 MANAGEMENT RECOMMENDATIONS:			12	0	2	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
			IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
CULTURE	5.1	LASD must emphasize respect for, and communications with, inmates	X				On-going
	5.2	Force prevention policy should be stressed in Academy and Custody Division training		X			On-going for new deputies; in progress for existing staff
	5.3	Ethics training should be enhanced in Academy and Custody Division training		X			On-going for new deputies; in progress for existing staff
	5.4	Custody should be a valued and respected assignment and career	X				Dual track implemented February 1, 2013.
	5.5	Senior leaders must be more visible in the jails	X				Position description amended.
	5.6	LASD must have a zero tolerance policy for acts of dishonesty	X				Revised Guidelines effective 2/17
	5.7	LASD should have a sensible rotation policy	X				Rotation implemented at unit level
	5.8	LASD should discourage participation in cliques		X			On-going for new deputies; in progress for existing staff
8 CULTURE RECOMMENDATIONS:			5	3	0	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
			IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
PERSONNEL AND TRAINING	6.1	LASD should revise its policies to reflect Custody's importance to Department		X			Dual track implemented February 1, 2013; Custody Training Bureau in progress.
	6.2	LASD should develop and implement a long-range and steady hiring plan	X				October 2, 2012 Sworn Hiring Projection Through 2017. Subject to funding.
	6.3	Custody personnel should receive significantly more Custody-specific training		X			Expanded Jail Operations and facility training for new deputies. Funding requested for Custody Training Bureau.
	6.4	There should be a meaningful probationary period for Custody deputies	X				January 9, 2013 Probationary Period Memorandum.
	6.5	LASD should increase the number of Custody supervisors			X		Department's analysis completed. Funding requested
	6.6	LASD should provide for careers in custody	X				Dual track implemented February 1, 2013.
	6.7	LASD should utilize more custody assistants		X			Department has achieved 65/35 ratio. Long term: complete assessment after achieving 65/35 ratio. Meet and confer issue.
	6.8	LASD should implement rotations within and among proximate facilities	X				
	6.9	LASD should change its Mission Statement to reflect importance of Custody	X				
	6.10	LASD should create a separate Custody Division		X			Short term: Dual track implemented February 1, 2013.
10 PERSONNEL & TRAINING RECOMMENDATIONS:			5	4	1	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
			IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
DISCIPLINE	7.1	The investigative and disciplinary system should be revamped			X		Funding requested
	7.2	The CFRC should monitor force packages	X				Risk Management Lieutenant also designated to monitor force packages
	7.3	Preclude deputies from reviewing videos before reporting use of force	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	7.4	Separate deputies involved in significant use of force incidents	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	7.5	Internal Affairs and ICIB should be enhanced and re-organized under a Chief	X				Implemented March 1, 2013
	7.6	IAB should be appropriately valued		X			Promotions for IAB personnel. Funding requested for additional IAB positions.
	7.7	There should be enhanced penalties for excessive force and dishonesty	X				Revised Guidelines 2/17
	7.8	There should be a Risk Manager assigned to each custody facility			X		Funding requested
	7.9	Force investigations should not be conducted by deputies' supervisors			X		Funding requested
	7.10	Use of force and dishonesty charges should not be reduced or held in abeyance	X				Revised Guidelines 2/17; management protocol 9/1/13
	7.11	LASD should vigorously investigate and discipline off-duty misconduct	X				On-going
	7.12	LASD should have an enhanced system to track force investigations	X				Implemented policy to use e-LOTS.
	7.13	Inmate use of force complaints should be tracked in PPI			X		Short-term: Tracked in FAST; November 2013: Tracked in PPI
	7.14	LASD should improve the inmate grievance process		X			Inmate grievance coordinator appointed. Developing pilot to electronically process and track grievances
	7.15	Increased use of Lapel Cameras			X		Short-term: Pilot program. Funding requested
15 DISCIPLINE RECOMMENDATIONS:			8	2	5	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

NO.	RECOMMENDATION					COMMENTS
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	

OVERSIGHT	8.2 The Sheriff should regularly report to the Board of Supervisors	X				On-going
	1 OVERSIGHT RECOMMENDATION:	1	0	0	0	

TOTAL CCJV RECOMMENDATIONS	39	10	11	0
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**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

CCJV CATEGORY	IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	TOTAL
USE OF FORCE	8	1	3	0	12
MANAGEMENT	12	0	2	0	14
CULTURE	5	3	0	0	8
PERSONNEL AND TRAINING	5	4	1	0	10
DISCIPLINE	8	2	5	0	15
OVERSIGHT	1	0	0	0	1
TOTAL SHERIFF RESPONSIBLE CCJV RECOMMENDATIONS	39	10	11	0	60

DEFINITIONS	
IMPLEMENTED (I)	The Department's implementation has been reviewed and approved by the Monitor, and reforms have been incorporated into operations.
PARTIAL (P)	The Department has implemented the recommendation, but some additional steps are required to complete the implementation.
IN PROGRESS (IP)	The Department is assessing policy, procedural, and operational needs and/or is in process of implementing recommendation.
NOT STARTED (NS)	The Department has not initiated, or just started the development of, an implementation plan.

Appendix 2

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.		RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report
USE OF FORCE	3.1	Comprehensive and easy-to-understand Use of Force policy in single manual	Partial	NC	NC	NC	NC	Implemented	NC	NC
	3.2	LASD personnel should be required to read and understand the new UOF policy	Implemented	NC	NC	NC	NC	NC	NC	NC
	3.3	LASD personnel should receive training on the new UOF policy	Implemented	NC	NC	NC	NC	NC	NC	NC
	3.4	The Use of Force policy should reflect Force Prevention and anti-retaliation policies	Implemented	NC	NC	NC	NC	NC	NC	NC
	3.5	The Use of Force policy should be based upon objectively reasonable standard	Partial	NC	NC	NC	NC	Implemented	NC	NC
	3.6	The Use of Force policy should reflect preference for planned, supervised, and directed force	Partial	NC	NC	NC	NC	Implemented	NC	NC
	3.7	The Use of Force policy should account for special needs populations	Partial	NC	NC	NC	NC	Implemented	NC	NC
	3.8	LASD should have a single, reliable and comprehensive data tracking system	Not started	NC	NC	In progress	NC	NC	NC	NC
	3.9	Inmate grievances should be tracked in PPI by names of LASD personnel	In progress	NC	NC	NC	NC	NC	NC	NC
	3.10	LASD should analyze inmate grievances regarding use of force incidents	Partial	NC	NC	NC	NC	NC	NC	NC
	3.11	Use of force statistical data must be tracked and analyzed in real time by management	Implemented	NC	NC	NC	NC	NC	NC	NC
	3.12	LASD should purchase additional body scanners	In progress	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

	NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report
			Implemented	NC	NC	NC	NC	NC	NC	NC
MANAGEMENT	4.1	Personal engagement by Sheriff in oversight of jails	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.2	High level managers must be accountable for failing to address use of force problems	In progress	NC	NC	NC	NC	NC	NC	Implemented
	4.3	The Undersheriff should not have any responsibility for custody or discipline	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.4	LASD should create a new Assistant Sheriff position for Custody	In progress	Implemented	NC	NC	NC	NC	NC	NC
	4.5	The Sheriff should appoint a new Custody Assistant Sheriff with corrections experience	In progress	Implemented	NC	NC	NC	NC	NC	NC
	4.6	The Custody Assistant Sheriff should report directly to the Sheriff	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.7	The Commander Management Task Force should not be a part of Custody management	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.8	The Sheriff must monitor the use of force in the jails	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.9	LASD should utilize the Sheriff's Critical Incident Forum (SCIF) in Custody	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.10	Senior management must be more visible in the jails	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.11	Operations support should be allocated based unique needs of each facility	In progress	NC	NC	NC	NC	NC	NC	NC
	4.12	LASD should created an Internal Audit and Inspection Division under a single Chief	In progress	NC	NC	NC	NC	NC	NC	NC
	4.13	LASD should have a policy regarding campaign contributions	In progress	Implemented	NC	NC	NC	NC	NC	NC
	4.14	LASD should participate in the Large Jail Network	Implemented	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

	NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report
CULTURE	5.1	LASD must emphasize respect for, and communications with, inmates	Implemented	NC	NC	NC	NC	NC	NC	NC
	5.2	Force prevention policy should be stressed in Academy and Custody Division training	Partial	NC	NC	NC	NC	NC	NC	NC
	5.3	Ethics training should be enhanced in Academy and Custody Division training	Partial	NC	NC	NC	NC	NC	NC	NC
	5.4	Custody should be a valued and respected assignment and career	In progress	Implemented	NC	NC	NC	NC	NC	NC
	5.5	Senior leaders must be more visible in the jails	Implemented	NC	NC	NC	NC	NC	NC	NC
	5.6	LASD must have a zero tolerance policy for acts of dishonesty	In progress	NC	Implemented	NC	NC	NC	NC	NC
	5.7	LASD should have a sensible rotation policy	In progress	Partial	NC	Implemented	NC	NC	NC	NC
	5.8	LASD should discourage participation in cliques	Partial	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.		RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report
PERSONNEL AND TRAINING	6.1	LASD should revise its policies to reflect Custody's importance to Department	In progress	Partial	NC	NC	NC	NC	NC	NC
	6.2	LASD should develop and implement a long-range and steady hiring plan	Implemented	NC	NC	NC	NC	NC	NC	NC
	6.3	Custody personnel should receive significantly more Custody-specific training	Partial	NC	NC	NC	NC	NC	NC	NC
	6.4	There should be a meaningful probationary period for Custody deputies	Implemented	NC	NC	NC	NC	NC	NC	NC
	6.5	LASD should increase the number of Custody supervisors	Not started	NC	NC	In progress	NC	NC	NC	NC
	6.6	LASD should provide for careers in custody	In progress	Implemented	NC	NC	NC	NC	NC	NC
	6.7	LASD should utilize more custody assistants	In progress	NC	NC	NC	Partial	NC	NC	NC
	6.8	LASD should implement rotations within and among proximate facilities	In progress	Partial	NC	Implemented	NC	NC	NC	NC
	6.9	LASD should change its Mission Statement to reflect importance of Custody	Implemented	NC	NC	NC	NC	NC	NC	NC
	6.10	LASD should create a separate Custody Division	In progress	Partial	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

	NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report
DISCIPLINE	7.1	The investigative and disciplinary system should be revamped	In progress	NC	NC	NC	NC	NC	NC	NC
	7.2	The CFRC should monitor force packages	Implemented	NC	NC	NC	NC	NC	NC	NC
	7.3	Preclude deputies from reviewing videos before reporting use of force	Partial	NC	NC	NC	NC	Implemented	NC	NC
	7.4	Separate deputies involved in significant use of force incidents	Partial	NC	NC	NC	NC	Implemented	NC	NC
	7.5	Internal Affairs and ICIB should be enhanced and re-organized under a Chief	In progress	NC	Implemented	NC	NC	NC	NC	NC
	7.6	IAB should be appropriately valued	In progress	Partial	NC	NC	NC	NC	NC	NC
	7.7	There should be enhanced penalties for excessive force and dishonesty	In progress	NC	Implemented	NC	NC	NC	NC	NC
	7.8	There should be a Risk Manager assigned to each custody facility	In progress	NC	NC	NC	NC	NC	NC	NC
	7.9	Force investigations should not be conducted by deputies' supervisors	In progress	NC	NC	NC	NC	NC	NC	NC
	7.10	Use of force and dishonesty charges should not be reduced or held in abeyance	In progress	NC	Partial	NC	NC	NC	NC	Implemented
	7.11	LASD should vigorously investigate and discipline off-duty misconduct	Implemented	NC	NC	NC	NC	NC	NC	NC
	7.12	LASD should have an enhanced system to track force investigations	In progress	NC	NC	Implemented	NC	NC	NC	NC
	7.13	Inmate use of force complaints should be tracked in PPI	In progress	NC	NC	NC	NC	NC	NC	NC
	7.14	LASD should improve the inmate grievance process	In progress	NC	NC	NC	Partial	NC	NC	NC
	7.15	Increased use of Lapel Cameras	In progress	NC	NC	NC	NC	NC	NC	NC
OVERSIGHT	8.2	The Sheriff should regularly report to the Board of Supervisors	Implemented	NC	NC	NC	NC	NC	NC	NC

Appendix 3

STATUS OF DEPARTMENT FUNDING REQUESTS

NO.	RECOMMENDATION	STATUS
3.8	LASD should have a single, reliable and comprehensive data tracking system.	Department submitted preliminary proposal to CEO. CIO working with Department to develop comprehensive package.
4.11	Operations support should be allocated based upon the unique needs of each facility.	Under review by Department; assessment expected by October 2013.
4.12	LASD should create an Internal Audit and Inspections Division under a single Chief.	Department's funding request and Implementation Plan reviewed by Consultants and Monitor, and submitted to CEO.
6.3	Custody personnel should receive significantly more Custody-specific training.	Department's funding request reviewed by Consultants and Monitor and submitted to CEO. CEO recommended to Board funding for 33 positions.
6.5	LASD should increase the number of Custody supervisors.	Department's funding request reviewed by Consultants and Monitor and submitted to CEO. CEO recommended to Board initial funding for 25 positions and is reviewing request for additional supervisors.
7.5	Internal Affairs and ICIB should be enhanced and reorganized under a Chief.	Department's funding request reviewed by Monitor and Consultants and submitted to CEO.
7.8	There should be a risk manager assigned to each custody facility.	Department's funding request reviewed by Consultants and Monitor and submitted to CEO. CEO recommended to Board funding for six Compliance Lieutenants.

Appendix 4

REMAINING RECOMMENDATIONS

Number	Recommendation	Funding	Status
3.8	Replace PPI and FAST	Yes	Funding request submitted to CEO
3.9	Tracking of Inmate Grievances in PPI	No	Complete by 9/30/13
3.10	Analyze Inmate Use of Force Grievances	Yes	See 7.8
3.12	Additional Body Scanners	No	Complete by 12/31/13
4.11	Allocation of Facilities Operations Resources	Yes	Assessment by 10/31/13; funding request anticipated
4.12	Internal Audit and Inspections Division	Yes	Inspectional Service Command proposal submitted to CEO
5.2	Force Prevention Policy training	Yes	See 6.3
5.3	Enhanced Ethics training	Yes	See 6.3
5.8	Discourage Cliques	Yes	See 6.3
6.1	Enhance status of Custody	Yes	See 6.3
6.3	Enhance Custody Division Training	Yes	Custody Division Training Bureau proposal reviewed by CEO
6.5	Additional Supervisors	Yes	Request under review by Monitor and Consultants
6.7	Utilize more Custody Assistants	No	Meet and confer
6.10	Separate Custody Division	No	Long-term objective
7.1	Revamp Investigative and Disciplinary System	Yes	Request for additional IAB/ICIB resources reviewed by CEO
7.6	Enhance IAB/ICIB resources	Yes	See 7.1
7.8	Risk managers assigned to each facility	Yes	Request for Compliance Lieutenants reviewed by CEO
7.9	Force investigations by Compliance Lieutenant	Yes	See 7.1, 7.8
7.13	Tracking of grievances in PPI	No	See 3.9
7.14	Enhance Inmate Grievance process	No	Coordinator appointed; pilot electronic program in development
7.15	Additional use of lapel cameras	Yes	Proposal for additional fixed CCTV cameras in lieu of initial lapel camera deployment